



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**FEB 26 2010**

Ref: 8EPR-N

Mr. Doug Allbright  
HQ AMC/A7PI  
507 Symington Drive  
Scott Air Force Base, IL  
62225

Re: BRAC Beddown and Flight Operations of  
Remotely Piloted Aircraft at Grand Forks Air Force  
Base Draft Environmental Impact Statement  
Grand Forks County, North Dakota  
CEQ # 20100003

Dear Mr. Allbright:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Draft Environmental Impact Statement (EIS) for the BRAC Beddown and Flight Operations of Remotely Piloted Aircraft at Grand Forks Air Force Base, North Dakota (ND) prepared by the U.S. Air Force Headquarters Air Mobility Command in cooperation with the Federal Aviation Administration. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. It is EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project, which includes a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

Based on EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information present, EPA is rating the Preferred Alternative (i.e., Alternative A) a LO – Lack of Objections. A copy of EPA's rating criteria is attached.

## **PROJECT DESCRIPTION**

To comply with the 2005 Base Realignment and Closure (BRAC) Commission directive, the Air Force is realigning installations to produce a more efficient and cost effective base structure for achieving national military objectives. At Grand Forks Air Force Base (GFAFB), the Air Force was directed to modify infrastructure at the base to accommodate the emerging

remotely piloted aircraft (RPA) mission. In support of this effort, the Air Force is proposing to locate Remotely Piloted Aircraft (RPA) at GFAFB and modify the existing airspace structure around GFAFB, in existing Military Operations Areas (MOAs) (i.e., airspace established to separate or segregate certain non-hazardous military activities from other air traffic), and within North Dakota as necessary to perform the proposed RPA operations and training. The current airspace structure around GFAFB does not provide the restricted area (RA) necessary to permit the RPA to operate and train. The relocation of the KC-135 mission from GAFB to other Air Force bases is a separate and distinct BRAC action. Two types of RPAs would be located at GFAFB – eight Global Hawk high altitude aircraft, which are 44 feet long and can achieve speeds up to 450 miles per hour (mph) with a range of over 10,000 miles, and eight Predators, a medium altitude, 27-foot-long aircraft that can fly up to 135 mph with a range of 460 miles. Auxiliary facilities would include four Mission Control Elements and two Launch Recovery Elements for the Global Hawks and one Launch and Recovery Ground Control Station and one Primary Satellite Link for the Predators. The proposed action would include the construction of one new four-bay RPA hanger and nine separate infrastructure projects; the demolition of two existing structures; and the renovation of ten existing structures. The incoming and outgoing missions involve approximately the same number of personnel – about 1,000.

GFAFB is located on 5,222 acres on U.S. Highway 2 in Grand Forks County, ND, near the North Dakota-Minnesota border and 15 miles west of the City of Grand Forks. Two other locations are a part of the RPA mission: (1) Camp Grafton South, in Eddy County near Warwick, ND, and (2) Hector International Airport in Fargo, ND. The RPA will use the 8,862-acre Camp Grafton South site with its 2,600-acre RA for laser target practice. No site work at Camp Grafton South is anticipated other than the installation of warning signs and the temporary placement of placards or former vehicle type targets. At present, there are two Ground Control Stations at Hector International Airport; they will remain with the change of mission. While all RPA launch and recovery operations would be located at GFAFB, once the RPA are airborne, command and control would be transferred to Hector and then transferred back to GFAFB prior to landing. There would be no new construction, demolition, or renovation at Hector.

In addition, there would be three MOAs within approximately 80 miles of GFAFB that would be used for training. Two of the MOAs – Tiger and Devils Lake – are located to the west and away from Grand Forks International Airport and the third, Beaver, is located to the east of Grand Forks International Airport.

Four action alternatives (i.e., Alternatives, A, B, C, and D) that include different combinations of facility and airspace actions and the No Action Alternatives are assessed in the Draft EIS.

## **RESOURCE IMPACTS**

Because the mission is changing from an air refueling mission to a RPA training mission, the impacts to the environment are anticipated to decrease.



Soils: There would be impacts to less than 5 acres of soil, and construction impacts, including runoff and soil loss, would be minimal and temporary. As noted, a National Pollution Discharge Elimination System permit from the U.S. Army Corps of Engineers would be required.

Water Resources: Only 0.1 acre of impervious surface would be added and no storm water protection, erosion, or sediment control issues are foreseeable. However, storm water management would be conducted during any soil excavation activities in accordance with the existing Grand Forks AFB Storm Water Pollution Prevention Plan. Because the base population would stay the same, there would be no change in wastewater impacts.

Biological Resources: The Bird Aircraft Strike Hazard would be lower with the RPA mission than it is with the current air refueling mission. The only protected species that has been documented at Camp Grafton South is the piping plover, which was documented along the shores of Lake Coe and is commonly found near water bodies or wetlands. Because of reflectivity issues associated with the use of the onboard RPA laser, the laser would not be used if standing water was present in any of the proposed target areas.

Air Quality: There are no non-attainment areas in North Dakota and the nearest Class 1 area is 265 miles northwest of GFAFB and 150 miles northwest of Devils Lake, ND. Thus, the Preferred Alternative would be unlikely to adversely impact any Class 1 area. Greenhouse gas emissions associated with the project are quantified in the Draft EIS.

Noise: It is anticipated that when the transition to the new mission is complete, noise levels from aircraft in the base area will be reduced by approximately 80 percent.

Environmental Justice: The only area that has disproportionate numbers of disadvantaged populations is in the center transit corridor between the proposed RAs of the Devils Lake and Tiger MOAs. This corridor runs directly over the Spirit Lake Indian Reservation. Because the RPAs would be flying above 4,000 feet, aircraft could be heard but are not expected to be intrusive to individuals on Tribal lands. The Air Force has initiated consultations with the Spirit Lake Indian Reservation to avoid overflight during ceremonies or personal spiritual events that occur during specific months of the year. EPA recommends summarizing all correspondence with the Tribes and consider placing the correspondence in the Final EIS.

## **ADDITIONAL COMMENTS**

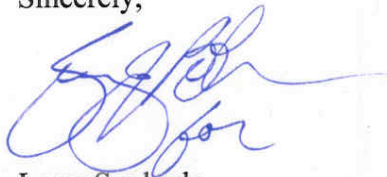
The graphics were helpful in explaining complicated issues to a lay audience. A good example is Figure 2.2-1 Airspace Types.

The list in Section 1.3.2 Additional Environmental Statutes and Regulations is incomplete. EPA recommends adding other environmental statutes (e.g., the Endangered Species Act, Migratory Bird Treaty Act, and Clean Water Act) to the list.

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement for the BRAC Beddown and Flight Operations of Remotely Piloted Aircraft at Grand

Forks Air Force Base. If you have any questions or would like to discuss our comments or rating, please contact me at 303-312-6004 or the lead reviewer of this project, Carol Anderson, at 303-312-6058.

Sincerely,



Larry Svoboda  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

Enclosure: EPA's Rating System Criteria



## **U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements**

### **Definitions and Follow-Up Action\***

#### **Environmental Impact of the Action**

**LO -- Lack of Objections:** The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC -- Environmental Concerns:** The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO -- Environmental Objections:** The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU -- Environmentally Unsatisfactory:** The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### **Adequacy of the Impact Statement**

**Category 1 -- Adequate:** EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 -- Insufficient Information:** The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new, reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 -- Inadequate:** EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.